0075

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DIVISION OF
OIL, GAS & MINING

September 29, 1993

Daron Haddock, Permit Supervisor
Division of OIl, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Haddock:

**RE: NOV N93-39-5-3 2 OF 3**

Enclosed are DOGM forms C1 and C2 for a permit change for the abatement of NOV N93-39-5-3 2 of 3.

If you need any additional information, please contact Keith Zobell.

Sincerely,

Ken M. Payne
Vice President/General Manager

Keith Zobell:gb
Enclosures
xc: Keith Zobell

**Utah Fuel Company**
A SUBSIDIARY OF THE COASTAL CORPORATION
P. O. BOX 719 • HELPER UT 84526 • 801/637-7925 • FAX 801/637-7929
SALT LAKE 801/596-7111

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OCT 07 1993
DIVISION OF
OIL, GAS & MINING

October 4, 1993

Daron Haddock, Permit Supervisor
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Abatement of NOV 93-39-5-3 1 of 3

Dear Mr Haddock,

Part A of the abatement of NOV 93-39-5-3, 1 of 3, calls for a plan to be submitted to the Division for approval to correct the nature of the violations.

Due to the complexity and the uncertainty revolving around this issue, we feel it more appropriate at this stage to submit a written conceptual plan to the Division for review and approval about how to address this issue. After we, (DOGM, OSM, and the permittee) have reached agreement on the conceptual approach we (the operator) will do the necessary design and M&RP permit changes and submit them to the Division for approval.

The conveyor bench was originally constructed over twelve years ago. During that time we have changed the drainage pattern four times. This latest NOV will lead to the fifth time. All of these changes have been at the request an inspector or a result of an enforcement action. Each change has been approved by the Division and yet a new inspector will decide that it doesn't meet the regulation in some respect and want it changed. None of the enforcement actions have been for failure to meet the approved drainage system. As a prudent mine operator, we want to comply but not continue making changes at the whim of an inspector. We want this current change to be the last, unless it fails to perform. We want to have a complete review and concurrence by all parties (including OSM) for the drainage control of the overland conveyor route.

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*If you require additional information for this conceptual plan, please contact Keith Zobell at 801-637-7925.*

*Sincerely,*

*Ken Payne*
*Vice President/General Manager*
*Utah Fuel Company*

*KP:KZ:dk*
*Attachment*

**SEDIMENT CONTROL DESIGN PLAN**

**OVERLAND CONVEYOR AREA AND SOUTH FORK TOPSOIL STORAGE AREA**

This plan has been developed to:

1. Partially satisfy the abatement of NOV N93-5-3 1 of 3 and;
2. Develop a satisfactory design to meet the requirements of R645-301-742.

A. Overland conveyor belt area from the minesite to the railroad loadout area.

This area should be divided into four different prescription areas:

1. Area 1 would go from the minesite to the first draw.
2. Area 2 would go from the first draw down to truss number T79 or approximately 100 yards from the end of the conveyor bench.
3. Area 3 would go from truss number T79 to the end of the conveyor bench.
4. Area 4 would go from the end of the conveyor bench to the lower end of the overland conveyor.

Area 1 has a fairly large cut slope above it which is contributing some silt onto the overland conveyor bench. We can still get our small mine grader on this section of the overland conveyor bench. We would first grade off the rocks that can be reached with the grader. These rocks would be stored on the permit area to be used later as rip rap or hauled to the Scofield coal mine waste site. The conveyor bench would then be insloped and a designed ditch would be constructed along the outside edge of the conveyor tower bases. The drainage ditch would be designed to safely pass the peak runoff of a 10 year, 6 hour precipitation event for the conveyor bench area and the adjacent slope. The drainage ditch would direct the water to two designed treatment areas. The first treatment area would be a sediment retaining area using straw dikes and or siltation fence to treat the run off water before it enters the UDOT drainage ditch. The second treatment area would be a sediment trap with a straw dike and or silt fence to further treat any overflow.

Area 2 is the longest area of similar treatment. This area basically has a good cover of vegetation on the conveyor bench itself and has a relatively short cut slope above it. Designed cross drains will be placed at approximately 50 ft. intervals along the conveyor bench. These cross drains

would be designed to safely pass the 10 year, 6 hour precipitation event for the conveyor and adjacent slope. The outfall off the cross drain will have a straw dike and or silt fence installed.

Area 3 will have similar treatment as Area 2 except the cross drains will need to be reconstructed and the design of the cross drains will be different since the adjacent cut slope is much higher.

Area 4 is where there is no constructed conveyor bench and the overland conveyor is supported on concrete footers and steel bent legs. This area is basically well vegetated and we propose to set up a demonstration using the SED-CAD program and ~~then~~ hopefully then request this area to be classified as an exempt area.

The vegetation on areas 1 and 3 is less than desirable. We would like to propose that in addition to the designed siltation control structures that these two areas be set up as a test plot and a application of biosolids sludge be incorporated into the existing soil to help in the vegetation establishment. If this approach is agreeable with the division we will include a detailed plan for this use of sludge material.

B. Topsoil Piles at South Fork Breakout Area

The topsoil removed from the South Fork Breakout Area is stored at two different locations. both of the topsoil location areas are well vegetated and there is no evidence of soil movement. Therefore we feel that the areas are meeting the requirements of R645-301-234 and should qualify for a small area exemption under R645-301-742.240. Our plan is to demonstrate that siltation structures and alternate sediment control measures are not needed using the SED-CAD computer modeling program.